



*United States Attorney  
Southern District of New York*

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*50 Main Street, Suite 1100  
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January 10, 2024

**BY ECF**

The Honorable Philip M. Halpern  
United States District Court Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

**Re: *United States of America v. \$690,000*, No. 7:22-cv-00266 (PMH)**


Dear Judge Halpern:

The Government writes in relation to the captioned matter. As set out in the Government's prior correspondence, criminal charges have been filed against several individuals in relation to, among other things, the transactions underlying the civil forfeiture proceedings in this case. *See United States v. Zubaid et al.*, 22 Cr. 650 (JPO). On December 23, 2022, this Court so-ordered an application from the Government seeking to hold this matter in abeyance pending a resolution of the related criminal matter. *See* Dkt. 22. At the Government's request, the Court has set a control date of January 17, 2024 by which to provide a status update on the criminal matter, which the Court recently rescheduled to January 29, 2024. *See* Dkt. 26.

The Government now writes to inform the Court that the above-referenced criminal matter remains pending. On December 20, 2023, a superseding indictment was filed. On December 28, 2023, defendant Julian Rebiga pled guilty to a money laundering count charged in the superseding indictment. Trial against defendant Martin Mizrahi is scheduled to begin on February 14, 2024. In view of the continued progression of the criminal matter, the Government respectfully requests that the Court adjourn the January 17, 2024 conference in this case and set a new control date in approximately six months for a further update. Counsel for claimants Brownsville Community Development Corp. and LV.Net have consented to this request. Counsel for claimant Bahram Madaen has withdrawn, and thus Mr. Madaen does not appear to be presently represented.

Respectfully submitted,

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cc: All Counsel of Record (via ECF)